

QA-21485

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ROBERT EZERMAN

DTI MASTER TRAINER

Telephone 802 878 2256

227 OLD STAGE ROAD
WILLISTON, VT 05495
26 January, 1997

Docket Clerk, Attention FHWA Docket #MC-96-28
Federal Highway Administration, Department of Transportation
Room 4232
400 7th Street SW
Washington, DC 20590

LEGS./REGS. DIV.

97 JAN 3 ALL: 14

ADMINISTRATION

Dear Docket Clerk:

As a practicing physician for twenty years before becoming a truck driver four years ago, I have some thoughts about your
HOURS OF SERVICE

1. Safe truck driving demands continuous alertness for earliest possible identification of the unexpected hazard.
2. Continuous alertness is not possible without circadian sleep.
3. There is no scientific evidence that an 8 hour non-circadian break is equivalent to an 8 hour circadian break, yet both allow another 10 hours of driving. There is a lot of evidence in many fields of endeavor that disturbance of circadian sleep pattern is fraught with hazards for both emotional and physical health.
4. In my experience, a 4-5 hour circadian break is more refreshing than an 8 hour non-circadian break.
5. The HOS rules have served the industry well for several decades and should be modified, not replaced.
6. The best modification will encourage trucking companies and independent drivers to make greater use of circadian breaks.

Sincerely,

Robert H. Ezerman, M.D.

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